

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOE W. KUEFLER, Individually and on	)	
Behalf of All Others Similarly Situated	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO. 06-cv-11620-JLT
	)	
WEBLOYALTY.COM, INC. and	)	
FANDANGO, INC. d/b/a	)	
FANDANGO.COM	)	
	)	
Defendants.	)	
	)	

**MOTION TO ADMIT STEVEN LIEBERMAN PRO HAC VICE**

Pursuant to Local Rule 83.5.3(b) and on behalf of the defendants, Webloyalty.com, Inc. (“Webloyalty”) and Fandango, Inc., d/b/a Fandango.com (“Fandango”), Gabrielle Wolohojian moves for the admission *pro hac vice* of Steven Lieberman, and states as follows:

1. I am a member of the bar of this Court in good standing.
2. Steven Lieberman has graduated from Columbia Law School in 1984 and is admitted to practice law in the following United States District Courts:
 

United States District Court for the Southern District of New York  
 United States District Court for the Eastern District of New York  
 United States District Court for the Northern District of New York  
 United States District Court for the Southern District of California  
 United States District Court for the Northern District of California  
 United States District Court for the District of Columbia  
 United States District Court for the District of Colorado.
3. Steven Lieberman is an attorney at Rothwell, Figg, Ernst & Manbeck, 1425 K Street N.W., suite 800, Washington D.C. 20005.
4. Steven Lieberman is a member in good standing of the New York State and District of Columbia bars.

5. There are no disciplinary proceedings against Steven Lieberman and he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

WHEREFORE, Gabrielle Wolohojian requests that Steven Lieberman of Rothwell, Figg, Ernst & Manbeck, 1425 K Street N.W., Suite 800, Washington D.C. 20005, be admitted to practice before this Court for all purposes in connection with the representation of Defendants in this proceeding.

Respectfully submitted,

/s/ Gabrielle Wolohojian  
Gabrielle Wolohojian (BBO #555704)  
Gabrielle.Wolohojian@wilmerhale.com  
Wilmer Cutler Pickering Hale and Dorr LLP  
60 State Street  
Boston, MA 02109  
Phone: 617-526-6000  
Fax: 617-526-5000

Dated: October 31, 2006

Certificate of Service

I, Gabrielle R. Wolohojian, hereby certify that a true and accurate copy of the above document has been filed and served through the Court's electronic filing system, this 31st day of October, 2006.

/s/ Gabrielle Wolohojian

**RULE 7.1(A)(2) STATEMENT**

Counsel for Defendants has conferred with counsel for Joe W. Kuefler and all parties consent to this motion.

/s/ Gabrielle Wolohojian

**CERTIFICATE OF GOOD STANDING**

Pursuant to Local Rule 83.5.3(b) of the United States District Court for the District of Massachusetts, I, Steven Lieberman hereby certify that:

1. I was admitted to the bar of the State of New York on March 25, 1985 and the District of Columbia bar on November 5, 1993. I have also been admitted to practice the following United States District Courts:

United States District Court for the Southern District of New York, 06/18/85  
United States District Court for the Eastern District of New York, 09/13/85  
United States District Court for the Northern District of New York, 10/01/90  
United States District Court for the Southern District of California, 10/27/93  
United States District Court for the Northern District of California, 01/28/94  
United States District Court for the District of Columbia, 10/03/94  
United States District Court for the District of Colorado, 10/17/00.

2. I am a member in good standing in every jurisdiction in which I have been admitted to practice.

3. I was graduated from Columbia Law School in 1984.

4. No disciplinary proceedings are pending against me as a member of any bar in any jurisdiction.

5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

6. My name and employment contact information are as follows:

Steven Lieberman  
Rothwell, Figg, Ernst & Manbeck  
1425 K Street N.W. Suite 800  
Washington D.C. 20005  
(202)783-6040

Dated: October 10, 2006

/s/ Steven Lieberman